



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

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FERNALD

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REPLY TO THE ATTENTION OF:

1068

OCT 31 1997

Mr. Johnny W. Reising  
United States Department of Energy  
Feed Materials Production Center  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705

SRF-5J

RE: Recycling Project  
Work Plan

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) work plan for recycling, supplemental projects.

This work plan details the recycling projects required pursuant to the July 22, 1997, dispute resolution agreement between U.S. EPA and U.S. DOE.

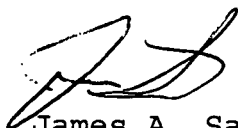
Overall, the work plan meets the requirements of the dispute resolution agreement. However, a few areas require further information and clarification.

Therefore, U.S. EPA disapproves the recycling projects work plan pending incorporation of adequate responses to the attached comments. U.S. DOE must submit responses to comments and a revised document within thirty (30) days receipt of this letter.

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Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,



James A. Saric  
Remedial Project Manager  
Federal Facilities Section  
SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OEPA-SWDO  
Bill Murphie, U.S. DOE-HDQ  
John Bradburne, FERMCO  
Terry Hagen, FERMCO  
Tom Walsh, FERMCO

Commenting Organization: U.S. EPA                      Commentor: Saric  
Section #: 3.1                      Page #: 3                      Line #: 13

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: 3.1 Page #: 3 Line #: 19

Commenting Organization: U.S. EPA                      Commentor: Saric  
Section #: 3.2                      Page #: 3                      Line #: 27

Commenting Organization: U.S. EPA                      Commentor: Saric  
Section #: 3.0                      Page #: Figure                      Line #: NA

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Commenting Organization: U.S. EPA                      Commentor: Saric  
Section #: 4.1                      Page #: 6                      Line #: 11  
Comment: The text states that after blasting, the baking soda  
and contaminant mixture will be washed away using additional  
water, stored, and subsequently treated. The text does not  
indicate how this washwater will be collected for storage or  
how decontamination of storage vessels will be performed.  
Text should be revised to include this information.

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: 4.1 Page #: 6 Line #: 31  
Comment: The text states that after vacuum grit blasting, if the  
resulting waste requires stabilization, the stabilized waste  
will be sampled and characterized for toxicity  
characteristic leaching procedure (TCLP) metals, as well as  
for the radiological characterization requirements of the  
Nevada Test Site (NTS). The text does not indicate what  
activities will be conducted after sampling and  
characterization. The text should be revised to include  
this information.

Commenting Organization: U.S. EPA      Commentor: Saric  
Section #: 5.0      Page #: 7      Line #: 7  
Comment: The text states that all vendor bids will be evaluated,  
and if the bid is preferential to processing the metal  
through the MRF, a task order will be placed. The text in  
Section 2.0, Page 2, Line 17, indicates that DOE will use a  
life-cycle approach to determine if a vendor will be used  
instead of the MRF. The text in Section 5.0, Page 7, Line 7,  
should be revised to describe the life-cycle approach that  
will be used to determine if a vendor or the MRF will be  
used to decontaminate and release materials for unrestricted  
use.

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: 7.0 Page #: 10 Line #: 22  
Comment: The text states that Table 3 identifies estimated project costs for decontaminating and releasing the identified types and quantities of metals discussed in Section 3. However, the text does not discuss methods and assumptions used to estimate project costs for the general activities listed in Table 3. The text should be revised to discuss detailed activities that will be conducted to accomplish the general activities presented in Table 3. The text should also be revised to discuss how costs were developed for each detailed activity and the general activities presented in Table 3.